IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA CHARLESTON DIVISION

JOHNNY R. HAYES,) C/A No.: 2:20-cv-04481-DCN
Plaintiff,)) STIPULATION OF PLAINTIFF AS TO) AMOUNT IN CONTROVERSY
v.)
HYUNDAI MOTOR AMERICA, INC.,))
Defendant.))

Plaintiff, Johnny R. Hayes, by and through his undersigned counsel, hereby stipulates that at present his damages do not exceed seventy-five thousand and 00/100 (\$75,000.00) dollars. Plaintiff further states this limitation is for the sole purpose of defeating diversity jurisdiction. If Plaintiff intends to amend the complaint to seek more than seventy-five thousand and 00/100 (\$75,000.00) dollars, he will do so within one (1) year and in such a manner as to afford Defendant time to remove the case. If Plaintiff does not amend within one (1) year as set forth, then his damages are forever limited not to exceed seventy-five thousand and 00/100 (\$75,000.00) dollars.

PETERS, MURDAUGH, PARKER, ELTZROTH & DETRICK

BY: s/R. Alexander Murdaugh

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January 14, 2021 Hampton, South Carolina ATTORNEYS FOR PLAINTIFF